

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

GUILLERMO DELGADO DELGADO )  
(A [REDACTED] )  
Petitioner, )  
v. )  
KRISTI NOEM, Secretary, U.S Department of ) Case No. 25-cv-1249  
Homeland Security; and )  
ROBERT LYNCH, Field Office Director, Detroit )  
Field Office, Immigration and Customs )  
Enforcement, )  
Respondents. )

**MOTION FOR TEMPORARY RESTRAINING ORDER**  
**AND PRELIMINARY INJUNCTION**

Petitioner, GUILLERMO DELGADO DELGADO, by and through undersigned counsel, files for a Temporary Restraining Order to be followed by a preliminary injunction pursuant to Rule 65 of the Federal Rules of Civil Procedure to prevent further irreparable harm to Petitioner before the Court can consider the merits of this case. In support thereof state as follows:

1. As Petitioner notes in his Petition for Writ of Habeas Corpus (Dkt. 1), which is hereby incorporated by reference, Petitioner is currently detained unlawfully in ICE custody in violation of his constitutional and statutory rights.
2. The actions of the Respondents violate both the Due Process Clauses of the Fifth Amendment to the United States Constitution and the Immigration and Nationality Act.
3. Petitioner is being caused irreparable harm for which there is no adequate remedy at law.

4. The harm that Petitioner is being caused and is facing in the future far outweigh any harm that a temporary restraining order will cause the Respondents.
5. The public interest will be served by the issuance of a temporary restraining order.
6. In addition to his Petition for Writ of Habeas Corpus and Emergency Injunctive Relief, Petitioner separately submits his memorandum of law, which is also incorporated by reference.

WHEREFORE, Petitioner requests that this Court enter a temporary restraining order that enjoin Respondents from directly or indirectly enforcing, implementing, or otherwise taking any action or imposing any legal consequences- including moving or removing Petitioner, and to enjoin Defendants' decision to continue Petitioner's detention and to order Respondents to release Petitioner, or in the alternative, to order Respondents to hold a neutral bond, and after a briefing and hearing enter a preliminary injunction continuing the temporary restraining order, and for all other proper relief.

Dated: October 31, 2025

Respectfully Submitted,

/s/ Nicole Provax

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Attorney for Petitioner

**CERTIFICATE OF SERVICE**

I hereby certify that on October 31, 2025, I electronically filed the foregoing with the clerk of the court by using the CM/ECF system, which will send a notice of electronic filing to counsel for the Respondents.

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